BROOKHAVEN NATIONAL LABORATORY Safety & Health Services Division INDUSTRIAL HYGIENE GROUP Standard Operating Procedure: Program Procedure SUBJECT: IH Group's Environmental Management System Program 1 OF 8

Contents

- 1.0 Purpose & Scope
- 2.0 Responsibilities
- 3.0 **Definitions**
- 4.0 Prerequisites
- 5.0 Precautions
- 6.0 Procedure/ Equipment
- 7.0 Implementation and Training
- 8.0 References
- 9.0 Attachments
- 10.0 Documentation



1.0 Purpose & Scope

This document describes the program of the SHSD Industrial Hygiene Group for compliance with BNL's *Environmental Management System (EMS)* for ISO14001. The purpose of the procedure is to establish an effective process to analyze the environmental impacts of new and existing IH Group operations. The program is used to validate regulatory compliance and to target program improvements.

Internal IH Group EMS Goals are:

- Minimize Impact on the Environment from IH Group Operations
 - Mechanism to Active Goal: Eliminate un-necessary operations that generate wastes/emissions; Select less hazardous alternatives whenever possible; Review the EMS Program and IH Group Impact Attachment on at least an basis to keep it current
- Maintain high level of Training and awareness of the IH Group environmental program
 - o Mechanism to Active Goal: Conduct IH Group Employee training on at least a biannual basis.

2.0 Responsibilities

This procedure is administered through the SHSD Industrial Hygiene Group.

BROOKHAVEN NATIONAL LABORATORY Safety & Health Services Division INDUSTRIAL HYGIENE GROUP Standard Operating Procedure: Program Procedure SUBJECT: IH Group's Environmental Management System Program PAGE 2 OF 8

- 2.1 The IH Group Leader is responsible to:
 - 2.1.1 Lead the creation of a compliant program.
 - 2.1.2 Assess the IH Group's progress on the program, as necessary.
 - 2.1.3 Assign IH staff to conduct operations covered by this program.
 - 2.1.4 Ensure that the IH Staff follow the policies of this program.
- 2.2 This procedure is implemented through the SHSD Industrial Hygiene Group. The IH Group members are responsible to:
 - 2.2.1 Read and understand the written SHSD Operation Environmental Evaluations (*SOEE*) (see the example in Attachment 9.1). The official version of the *SOEE*s are accessible from the SHSD OHS/EMS/ISM Webpage.
 - 2.2.2 Conduct operations in accordance with this program.

3.0 <u>Definitions</u>

SHSD Operation Environmental Evaluations (SOEE): a written evaluation of shsd operations conducted by the IH Group Leader to determine the degree of environmental impact caused by the operation and to

- ensure that control are in place to minimize the environmental impact to the greater extent reasonably achievable and
- determine the appropriate waste stream, if applicable.

4.0 **Prerequisites** none

5.0 Precautions none

6.0 Procedure

- 6.1 **Equipment:** See items listed in each SHSD Operation Environmental Evaluation.
- 6.2 **Assessing the hazard of IH Group operations:** The IH Group Leader or IH Group staff identifies operations that need to be reviewed for EMS compliance. For new operations or operations that have not been adequately analyzed, the IH Group Leader

BROOKHAVEN NATIONAL LABORATORY Safety & Health Services Division	NUMBER IH50900
INDUSTRIAL HYGIENE GROUP Standard Operating Procedure: Program Procedure	FINAL rev7
IH Group's Environmental	09/21/06
Management System Program	PAGE 3 OF 8

will assign a person to review the operation and determine needed actions. New actions and the analysis will be documented in a *SHSD Operation Environmental Evaluation*. For each IH group operation, the impact on the environment impact, minimization, and waste management will be analyzed and an appropriate mechanism established.

6.3 **Annual Review:** In the fourth quarter of each year, the IH Group Leader will review the IH Group's EMS program and determine if new elements need to be added in a *SHSD Operation Environmental Evaluation*. The review may be "collaborative" with ESWMD Environmental Compliance Representative. Elements of this review will be the accuracy of *SHSD Operation Environmental Evaluations* and the staff's training on their contents.

6.4 **Employee Involvement**:

- 6.4.1 When new employees enter the IH Group, via new hire, temporary assignment, or reassignment, they will read or be instructed in the content of applicable *SOEEs*.
- 6.4.2 When significant changes are made to *SOEE*, the IH Group Leader will forward the revised *SOEE* to each impacted IH Group employee.
- 6.4.3 Each employee will be expected to gain an understanding of the IH program and to sign their concurrence with policies set forth in *SOEE*.

7.0 <u>Implementation and Training</u>

- 7.1 **Qualification Criteria:** The IH Group Leader will instruct all IH staff in their role relative to this procedure, via formal sessions on the applicable *SOEE* associated with Job Training Assessments.
- 7.2 A written record of training will be maintained in the form of Job training Assessment Completion Certificate and tracked through the BTMS system. The form to use is maintained on the SHSD SOP web page in section IH50300.

8.0 References

The only official copy is on-line at the SHSD IH Group website. Before using a printed copy, verify that it is current by checking the document issue date on the website.

BROOKHAVEN NATIONAL LABORATORY Safety & Health Services Division	NUMBER IH50900
INDUSTRIAL HYGIENE GROUP Standard Operating Procedure: Program Procedure	FINAL rev7
IH Group's Environmental	09/21/06
Management System Program	PAGE 4 OF 8

BNL's ISO14001 Environmental Management System (EMS).

9.0 Attachments

- 9.1 Sample of the SHSD Operation Environmental Evaluations List
- 9.2 Sample of a SHSD Operation Environmental Evaluation
- 9.3 Sample of a JTA training Record form.

10.0 <u>Documentation</u>

Document Development and Revision Control Tracking			
PREPARED BY:	REVIEWED BY:	APPROVED BY:	
(signature and date on file)	(signature and date on file)	(signature and date on file)	
R. Selvey	J. Peters	R. Selvey, IH Manager	
Date 02/17/04	Date 02/18/04	Date 02/27/04	
ESH Coordinator/ Date:	Work Coordinator/ Date:	SHSD Manager / Date	
none	none	none	
QA Representative / Date:	Training Coordinator / Date:	Filing Code:	
none	none	IH52.05	
Facility Support Rep. / Date:	Environ. Compliance Rep. / Date:	Effective Date:	
none	none	02/27/04	
ISM Review - Hazard Categorization ☐ High ☑ Moderate ☐ Low/Skill of the craft	Validation: ☐ Formal Walkthrough ☐ Desk Top Review ☐ SME Review Name / Date:	IMPLEMENTATION: Training Completed: n/a Procedure posted on Web: 09/21/06 Hard Copy files updated: 09/21/06	

Revision Log	
Purpose: ☐ Temporary Change ☐ Change in Scope ☐ Periodic review ☐ Clarify/enhance procedural controls	
Changed resulting from: ☐ Environmental impacts ☐ Federal, State and/or Local requirements ☐ Corrective/preventive actions to non-conformances ☐ none of the above	
Section/page and Description of change: Added Goals to Section 1; Added information on battery recycling in Attachment 9.1 Section 13.	

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Safety & Health Services Division

INDUSTRIAL HYGIENE GROUP

Standard Operating Procedure: Program Procedure

SUBJECT:

IH Group's Environmental Management System Program

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FINAL rev7

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PAGE

5 OF 8

(signature/date on file) R. Selvey 06/08/04 SME Reviewer/Date:	Reviewer/Date:	Reviewer/Date:	
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Purpose: Temporary Change Chan	nge in Scope ☐ Periodic review ☒ Clarify	/enhance procedural controls	
	Changed resulting from: ☐ Environmental impacts ☐ Federal, State and/or Local requirements ☐ Corrective/preventive actions to non-conformances ☐ none of the above		
Section/page and Description of change: A Perchlorate sink disposal into Attachment 9	Added change to battery disposal as univer 9.1.	sal waste, ozone generating devise, and	
(signature/date on file) R. Selvey 09/01/04 SME Reviewer/Date:	Reviewer/Date:	Reviewer/Date:	
Purpose: Temporary Change Chan	ige in Scope 🗌 Periodic review 🛛 Clarify	/enhance procedural controls	
Changed resulting from: ☑ Environmenta actions to non-conformances ☐ none of the		equirements Corrective/preventive	
Section/page and Description of change: A	Added Respirator Cleaning to Attachment 9	.1. Revised the format of Section 10.	
(signature/date on file) R. Selvey 08/08/05 SME Reviewer/Date:	Reviewer/Date:	Reviewer/Date:	
<u></u>			
Purpose: Temporary Change Chan	ige in Scope 🗌 Periodic review 🛭 Clarify	/enhance procedural controls	
Changed resulting from: ☐ Environmental impacts ☐ Federal, State and/or Local requirements ☐ Corrective/preventive actions to non-conformances ☐ none of the above			
Section/page and Description of change: A	Added the use of Isopropanol in preservation	on of tick specimens to Attachment 9.1.	
(signature/date on file) R. Selvey 06/26/06 SME Reviewer/Date:	Reviewer/Date:	Reviewer/Date:	
Purpose: Temporary Change Chan	Purpose: ☐ Temporary Change ☐ Change in Scope ☐ Periodic review ☐ Clarify/enhance procedural controls		
Changed resulting from: ☐ Environmental impacts ☐ Federal, State and/or Local requirements ☐ Corrective/preventive actions to non-conformances ☐ none of the above			
Section/page and Description of change: The new TSI 3007 Condensation Particle Counter with its use of Isopropanol was added to Attachment 9.1.			
(signature/date on file) R. Selvey 07/12/06 SME Reviewer/Date:	Reviewer/Date:	Reviewer/Date:	

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BROOKHAVEN NATIONAL LABORATORY Safety & Health Services Division INDUSTRIAL HYGIENE GROUP Standard Operating Procedure: Program Procedure SUBJECT: IH Group's Environmental Management System Program NUMBER IH50900 FINAL rev7 DATE 09/21/06 PAGE 6 OF 8

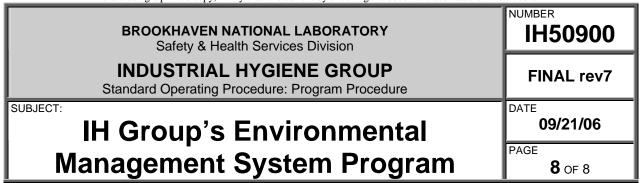
Purpose: ☐ Temporary Change ☐ Change in Scope ☒ Periodic review ☒ Clarify/enhance procedural controls		
Changed resulting from: ☐ Environmental impacts ☐ Federal, State and/or Local requirements ☐ Corrective/preventive actions to non-conformances ☐ none of the above		
Section/page and Description of change: Reformatted the scope of Attachment 9.1 into SHSD Operation Environmental Evaluation forms to ease in training of applicable persons and improve the linkage to the Job Training Assessment and the OHSAS 18001 Risk Assessments. Attachment 9.1 was converted to a sample List of SOEEs, Attachment 9.2 was added as a sample of the SOEE form. The official location for storage of the SOEEs was created on the SHSD OSH/EMS/ISM web page to ease inter-linking JRAs and SOEEs.		
(signature/date on file)		
R. Selvey 09/21/06 SME Reviewer/Date:	Reviewer/Date:	Reviewer/Date:

BROOKHAVEN NATIONAL LABORATORY Safety & Health Services Division	IH50900
INDUSTRIAL HYGIENE GROUP Standard Operating Procedure: Program Procedure	FINAL rev7
IH Group's Environmental	09/21/06
Management System Program	PAGE 7 OF 8

Attachment 9.1

Sample of List of SHSD Operation Environmental Evaluations

SOEE Number	Title	Environmental Risk Ranking
SHSD-EMS-01	HEPA Filter Testing	Acceptable
SHSD-EMS-02A	Air Current Indicator Tubes	Negligible
SHSD-EMS-02B	SF ₆ Tracer Gas Studies	Acceptable
SHSD-EMS-03A	Meter Calibration with Standard Gas Mixtures	Acceptable
SHSD-EMS-03B	Battery Disposal	Moderate
SHSD-EMS-04	Perchlorate Testing	Moderate
SHSD-EMS-05A	Air Sampling With Indicator Tubes	Negligible
SHSD-EMS-05B	Air Sar CANADI E	Negligible
SHSD-EMS-05C	Gas De SAMPLE	Acceptable
SHSD-EMS-05D	Surface See SHSD's OSH/EMS/ISM Web	Moderate
SHSD-EMS-05E	Microb Page for the official copy	Negligible
SHSD-EMS-05F	TSI Mo eration	Negligible
SHSD-EMS-06	[Not Assigned]	
SHSD-EMS-07	[Not Assigned]	
SHSD-EMS-08	Mercury Spill Clean-Up Supplies	Moderate
SHSD-EMS-09	[Not Assigned]	
SHSD-EMS-10	[Not Assigned]	
SHSD-EMS-11	Chemical Management System- Coding of Chemicals at Receiving Warehouse	Negligible
SHSD-EMS-12A	Quantitative Fit Testing	Negligible
SHSD-EMS-12B	Cleaning of Fit Test Respirators	Acceptable
SHSD-EMS-13	[Not Assigned]	
SHSD-EMS-14	[Not Assigned]	
SHSD-EMS-15	Isopropanol Preservation of ticks	Negligible
SHSD-EMS-16	Ozone generation in the remediation of indoor air quality complaints.	Substantial



Attachment 9.2

Sample of SHSD Operation Environmental Evaluations (SOEE) form

